

LOCHNER LAW FIRM, P.C.

TODD D. LOCHNER
GREGORY R. SINGER
EUGENE E. SAMARIN
MELAINA D. HAISFIELD (OF COUNSEL)*

91 MAIN STREET
ANNAPOLIS, MARYLAND 21401

PHONE (443) 716-4400 | FACSIMILE (443) 716-4405
WWW.BOATINGLAW.COM

TLOCHNER@BOATINGLAW.COM
GSINGER@BOATINGLAW.COM
ESAMARIN@BOATINGLAW.COM
MHAISFIELD@BOATINGLAW.COM

April 14, 2020

FILED VIA CM/ECF

The Honorable Stephanie A. Gallagher
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: Adams v. Sokol
Case No.: 1:18-cv-02245-GLR
Our No.: 15-149-01

Dear Hon. Stephanie A. Gallagher,

This joint letter is a response to your order for status update (ECF #62).

At this time, the parties are contemplating another mediation of the case, however due to the COVID 19 situation, this is placed on hold. Parties currently reside in Florida and New York, thus travel would be difficult at this time and is not advisable by the Maryland Department of Health. Counsel will update the Court once the state of emergency is lifted and travel arrangements can be made.

Further, the joint vessel inspection has not yet occurred, due to the current owner of the vessel avoiding service and due to limitation placed by the COVID 19 epidemic. Counsel have discussed the matter and have agreed that Plaintiff may conduct the inspection, at their earliest available time. Counsel will work together to accommodate each other's schedule. The inspection is not currently scheduled. Plaintiff requests that the court extend the discovery deadline, regarding the vessel inspection only, until June 15, 2020.

/S/ Eugene E. Samarin

Eugene E. Samarin, Esq. (# 19612)
Todd D. Lochner, Esq. (# 25691)
Lochner law Firm, P.C.
91 Main Street, 4th Floor
Annapolis, Maryland 21401
(410) 716-4400
tlochner@boatinglaw.com
esamarin@boatinglaw.com

Counsel for Plaintiff Adams

/S/ Rob O'Brien

Robert O'Brien, Esq. (#00003)
Bryant S. Green, Esq. (#19752)
Niles, Barton & Wilmer, LLP
111 S. Calvert Street, Suite 1400
Baltimore, MD 21202
(410) 783-6300
rpobrien@nilesbarton.com
bsgreen@nilesbarton.com

Counsel for Defendant Sokol

cc: All counsel of record (Via CM/ECF only)

* Barred in Florida, Texas and District of Columbia